

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Investigation by the Department on its own motion into the appropriate regulatory plan to succeed price cap regulation for Verizon New England, Inc. d/b/a Verizon Massachusetts' retail intrastate telecommunications services in the Commonwealth of Massachusetts

DTE 01-31

**LIST OF DOCUMENTS AT&T COMMUNICATIONS OF NEW ENGLAND, INC.
INTENDS TO MARK FOR IDENTIFICATION**

AT&T Communications of New England, Inc. ("AT&T") intends to offer the following documents to be marked for identification at the hearing:

I. Testimony of AT&T Witnesses:

A. John W. Mayo:

1. Rebuttal Testimony filed August 24, 2001, and
2. Surrebuttal Testimony filed November 1, 2001.

B. Deborah S. Waldbaum:

1. Rebuttal Testimony filed August 24, 2001,
2. Surrebuttal Testimony filed November 1, 2001, and
3. Supplemental Surrebuttal Testimony filed November 13, 2001.

C. Anthony Fea: Rebuttal Testimony filed August 24, 2001.

II. Responses to the following information requests:

A. Sponsored by Robert Mudge/John Conroy:

1. ATT-VZ 1-1, 1-2, 1-3 (Supp), 2-1, 2-2, 2-4, 2-5, 2-8 (Supp), 3-1, 5-2;
2. DTE-VZ 1-4, 1-5, 2-10, 4-3, 4-16;

3. AG-VZ 1-10, 2-5, 2-6, 3-18; and
 4. NP-VZ 1-4, 1-7, 1-8, 1-9, 1-10, 1-11, 1-12, 1-16, 1-21.
- B. Sponsored by Paula L. Brown:
1. DTE-VZ 1-7, 3-2; and
 2. AG-VZ 2-15, 2-16, 2-17.
- C. Sponsored by William E. Taylor:
1. DTE-VZ 2-13, 4-9; and
 2. AG-VZ 1-3, 1-4, 1-9, 2-13.
- D. Not Sponsored by a Verizon Witness:
1. ATT-VZ 4-21 (Supp), 4-23 (Supp).

In addition, AT&T intends to ask the Department to take administrative notice of:

1. Price Cap Compliance Filings by Verizon for the years 1995, 1996 (September), 1997, 1998, 1999, 2000;
2. Verizon Reports under the Performance Assurance Plan submitted in D.T.E. 99-271 (April 2001 – October 2001); and
3. Carrier-to-Carrier Guidelines Performance Standards and Reports filed by Verizon (January 2001 – November 2001).

AT&T filed in D.T.E. 01-31 a set of information requests virtually identical to a set filed in D.T.E. 01-34. According to Verizon counsel, Verizon intends to file in this docket all of responses already filed in D.T.E. 01-34 that are responsive to AT&T's information requests in D.T.E. 01-31. AT&T reserves its right to mark those responses for identification upon filing by Verizon. In the event Verizon fails to file the responses made in D.T.E. 01-34 and responsive to information requests filed in this docket, AT&T reserves the right to mark the D.T.E. 01-34

responses for identification.

Respectfully submitted,

**AT&T COMMUNICATIONS OF
NEW ENGLAND, INC.**

Robert Aurigema, Senior Attorney
AT&T Communications of New
England, Inc.
99 Bedford Street, 4th Floor
Boston, MA 02111

Jeffrey F. Jones, Esq
Kenneth W. Salinger, Esq.
Jay E. Gruber, Esq.
Katherine A. Davenport, Esq.
Palmer & Dodge LLP
111 Huntington Avenue
Boston, MA 02199
(617) 239-0449

December 12, 2001